

Exhibit A
Summons and Complaint

15033

RECEIVED

JUL - 8 2010

AT&T MOBILITY
LEGAL DEPARTMENT**FORM OF COVER SHEET FOR COMPLAINT**Court of Common Pleas of Beaver County -
Civil Division**Civil Cover Sheet**

For Prothonotary Use Only (Docket Number)

PLAINTIFF'S NAME Gerold Ray Miller	DEFENDANT'S NAME AT&T Mobility
PLAINTIFF'S ADDRESS 1225 Ohioview Drive Industry, PA 15052	DEFENDANT'S ADDRESS 2704 Commerce Drive Harrisburg, PA 17110
PLAINTIFF'S NAME	DEFENDANT'S NAME
PLAINTIFF'S ADDRESS	DEFENDANT'S ADDRESS
PLAINTIFF'S NAME	DEFENDANT'S NAME
PLAINTIFF'S ADDRESS	DEFENDANT'S ADDRESS

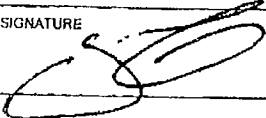
TOTAL NO. OF PLAINTIFFS 1	TOTAL NO. OF DEFENDANTS 1	COMMENCEMENT OF ACTION <input checked="" type="checkbox"/> Complaint <input type="checkbox"/> Writ of Summons <input type="checkbox"/> Notice of Appeal <input type="checkbox"/> Transfer From Other Jurisdictions
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AMOUNT IN CONTROVERSY <input type="checkbox"/> \$25,000 or Less <input checked="" type="checkbox"/> Over \$25,000	CASE TYPE <input type="checkbox"/> Motor Vehicle <input type="checkbox"/> Medical Malpractice <input type="checkbox"/> Other Professional Liability <input type="checkbox"/> Product Liability <input checked="" type="checkbox"/> Other: <u>Invasion of Privacy</u> <input type="checkbox"/> Mortgage Foreclosure <input type="checkbox"/> Ejectment <input type="checkbox"/> Statutory Appeals <input type="checkbox"/> Quiet Title <input type="checkbox"/> Partition <input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Replevin <input type="checkbox"/> Asbestos <input type="checkbox"/> Domestic Relations <input type="checkbox"/> Divorce <input type="checkbox"/> Custody
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TO THE PROTHONOTARY:

Kindly enter my appearance on behalf of Plaintiff/Petitioner/Appellant: (or Pro Se Litigant)

Papers may be served at the address set forth below

NAME OF PLAINTIFF/PETITIONER/APPELLANT'S ATTORNEY (OR PRO SE LITIGANT) Gianni Floro, Esquire		ADDRESS (SEE INSTRUCTIONS) 935 Beaver Grade Road, Suite 6 Moon Township, PA 15108	
PHONE NUMBER (412) 264-6040	FAX NUMBER (412) 264-2510	EMAIL ADDRESS gfloro84@comcast.net	
SIGNATURE 		SUPREME COURT IDENTIFICATION NO. 85837	DATE June 9, 2010

IN THE COURT OF COMMON PLEAS OF BEAVER COUNTY, PENNSYLVANIA

GAROLD RAY MILLER,

CIVIL DIVISION

Plaintiff,

No.: 11510 of 2009

v.

AT&T MOBILITY, LLC,
a corporation,

Defendant.

COMPLAINT IN CIVIL ACTION

Filed on Behalf of the Plaintiff:

Garold Ray Miller

Gianni Floro, Esquire
PA ID No. 85837
Counsel for the Plaintiff
935 Beaver Grade Road, Suite 6
Moon Township, PA 15108
P: (412) 264-6040
F: (412) 264-2510
E: gfloro84@comcast.net

2010 JUN -9 P 1:53
FILED
CLERK OF COURT
BEAVER COUNTY, PA

A JURY TRIAL IS DEMANDED

IN THE COURT OF COMMON PLEAS OF BEAVER COUNTY, PENNSYLVANIA

GAROLD RAY MILLER

CIVIL DIVISION

No.:

Plaintiff,

v.

AT&T MOBILITY, LLC,
a corporation,

Defendant.

NOTICE

You have been sued in Court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this Complaint and Notice are served, by entering a written appearance personally or by attorney and filing in writing with the Court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the Court without further notice for any money claimed in the Complaint or for any other claim or relief requested by the Plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

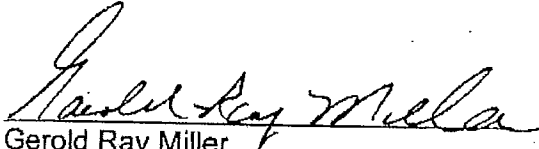
LAWYER REFERRAL SERVICE - THE BEAVER COUNTY BAR ASSOCIATION

788 TURNPIKE STREET
BEAVER, PA 15009
TELEPHONE NUMBER: (412) 728-4888

VERIFICATION

I hereby certify that I have read the foregoing Complaint in Civil Action, and that the statements made therein are true and correct to the best of my knowledge, information and belief. This statement and verification are made subject to the penalties of 18 Pa. C.S.A. Section 4904, relating to unsworn falsification to authorities, which provides that if I knowingly make false statements, I may be subject to criminal penalties.

Date: 06/09/2010


Gerold Ray Miller

IN THE COURT OF COMMON PLEAS OF BEAVER COUNTY, PENNSYLVANIA

GAROLD RAY MILLER,

CIVIL DIVISION

No.:

Plaintiff,

v.

AT&T MOBILITY, LLC,
a corporation,

Defendant.

COMPLAINT IN CIVIL ACTION

AND NOW COMES THE PLAINTIFF, Garold Ray Miller, by and through his attorney, Gianni Floro, Esquire, and files the following Complaint in Civil Action, and in support thereof avers as follows:

1. Plaintiff, Garold Ray Miller (hereinafter, "Miller"), is an adult individual who at all relevant times resides at 1225 Ohioview Drive, Industry, Beaver County, Pennsylvania 15052. Miller is also employed as the Chief of Police for the Borough of Industry.

2. Defendant, AT&T Mobility, LLC (hereinafter, "AT&T"), is a corporation providing mobile telephone services that at all times acted by and through its agents, ostensible agents, servants, employees, and/or independent contractors, who in turn were acting within the scope of their employment and on behalf of Defendant AT&T Mobility, LLC, with offices located at 2704 Commerce Drive, Harrisburg, Dauphin County, PA 17110.

3. In the Spring of 2008, Miller's wife confronted him in regard to his communication(s) with a woman he had been communicating with relative to an

investigation of criminal case.

4. Miller denied having communicated with the woman in question, as he had known the woman growing up and had also dated her in high school, and he did not wish to alarm his wife. His wife insisted that he was lying, later revealing to him in the summer that she had been allowed access to his mobile phone records by the Defendant and its representative. His wife also revealed that the Defendant's representative conducted a number search on his records, in order for her to confirm her suspicions that he was communicating with this woman.

5. Subsequent to this confrontation, the relationship between Miller and his wife was severely burdened. In an effort to repair relations, Miller invited his wife out for a drink before dinner at a nearby road house.

6. Upon consuming alcohol, Miller's wife became violently ill, confessing that she had been troubled by her suspicions.

7. As the sole, direct, legal and proximate result of the Defendant's release of information, Miller endured great psychological pain and suffering, and will continue to endure such pain and suffering to his psyche; he also suffered and continues to suffer humiliation, shame, embarrassment, self-revulsion, damage to his self-esteem and self-worth, mental anguish, inconvenience, and also suffers a loss of life's enjoyment, especially with regard to his family.

COUNT I
INVASION OF PRIVACY
Garold Ray Miller v. AT&T Mobility, LLC

8. Paragraphs 1 through 7 are incorporated by reference, as fully as if they were set forth at length herein.

9. When Defendant corporation released Miller's telephone records to Miller's wife, Defendant corporation unreasonably intruded upon Plaintiffs' solitude and seclusion.

10. The intrusion of Defendant corporation upon the solitude and seclusion of Plaintiff's privacy demonstrates conduct that is highly offensive to a reasonable person.

11. As a further direct and proximate result of the incident herein, Plaintiff suffered harm to his interest in privacy, for which he is entitled to a recovery.

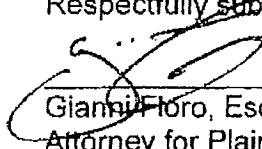
12. As a further direct and proximate result of the incident herein, Plaintiff suffered mental distress, for which he is entitled to a recovery.

13. Based upon the wanton, reckless and indifferent conduct of the Defendant corporation, the Plaintiff should be awarded punitive damages from the Defendant corporation because of the knowing, reckless and indifferent conduct to their privacy interests.

WHEREFORE, the Plaintiff respectfully requests that this Honorable Court enter judgment in his favor and against the Defendant in a sum in excess of twenty-five thousand dollars (\$25,000.00); exclusive of interest, costs, and punitive damages and other damages recoverable under the law.

A JURY TRIAL IS DEMANDED

Respectfully submitted,



Gianni Floro, Esquire
Attorney for Plaintiff
935 Beaver Grade Road, Suite 6
Moon Township, PA 15108
P: (412) 264-6040
F: (412) 264-2510
E: gfloro84@comcast.net

6-28-2010 COMPLAINT
REINSTATED
Nancy K. Hines

2010 JUL -6 AM 8:34



**Service of Process
Transmittal**

07/07/2010

CT Log Number 516902163

TO: Jan Mendel
AT&T Mobility LLC
1025 Lenox Park Blvd
Atlanta, GA 30319-5309

RE: Process Served in Pennsylvania

FOR: AT&T Mobility LLC (Domestic State: DE)

RECEIVED

JUL - 8 2010

AT&T MOBILITY
LEGAL DEPARTMENT

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION: Garold Ray Miller, Pltf. vs. AT&T Mobility, LLC, etc., Dft.
Name discrepancy noted.

DOCUMENT(S) SERVED: Cover Sheet, Notice, Verification, Complaint

COURT/AGENCY: Beaver County, Court of Common Pleas, Beaver, PA
Case # 11510 of 2009

NATURE OF ACTION: Invasion of Privacy

ON WHOM PROCESS WAS SERVED: CT Corporation System, Harrisburg, PA

DATE AND HOUR OF SERVICE: By Process Server on 07/07/2010 at 11:15

APPEARANCE OR ANSWER DUE: Within 20 days

ATTORNEY(S) / SENDER(S): Gianni Floro
935 Beaver Grade Road
Suite 6
Moon Township, PA 15108
412-264-6040

ACTION ITEMS: CT has retained the current log, Retain Date: 07/07/2010, Expected Purge Date:
07/12/2010
Image SOP
Email Notification, Jan Mendel JMB875@att.com

SIGNED: CT Corporation System

PER: Sabra Dudding

ADDRESS: 116 Pine Street
3rd Floor, Suite 320
Harrisburg, PA 17101

TELEPHONE: 717-234-6004